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October 26, 2016

Julius Knapp  
Chief, Office of Engineering and Technology  
Federal Communications Commission  
455 12th St SW  
Washington DC 20554

**Re: Public Notice, ET Docket 16-313, Office of Engineering and Technology Seeks Comment on Application by the American Association for Laboratory Accreditation Body for Expanded Scope Recognition as a Laboratory Accreditation Body for Authority to Accreditate Laboratories in Additional Countries**

Dear Mr. Knapp:

The American Association for Laboratory Accreditation (A2LA) has asked FCC for permission to accredit labs in non-MRA countries such as China, India, Philippines and Thailand, so that the labs can issue Declarations of Conformity (DoCs) or certifications for the manufacturers to gain the opportunity i.) to reduce the lead-time of certification and ii.) to minimize lead-time of samples-to-lab logistic arrangement, to market and sell products in United States. The Commission should be well considered the request of A2LA.

First, Lenovo summarized its detailed view of A2LA request. Lenovo:

- Supported A2LA's request to be granted FCC recognition to accredit laboratories in any non-MRA country.
- Supported the Commission to accept alternative pathways to FCC recognition for laboratories in non MRA economies
- Supported the Commission to accept an Authority Body in any country can request FCC recognition to accredit laboratories in any non-MRA economies.

Further, Lenovo China expressed its long-standing support the Commission's effort of providing opportunity for accrediting laboratories in non MRA economies. Lenovo Also urged for the Commission to take action on A2LA's pending request that the Commission 1.) implement its policies for the re-certification of laboratories in countries without a telecommunications MRA in place and which were accredited by a Commission-recognized accreditation body; 2.) provide an alternative path forward to re-certification for 2,948 listed laboratories in non-MRA countries as soon as possible, such that this process is finalized and made public for such laboratories to undergo and complete such process.

This letter is being electronically filed via the Commission's Electronic Comment Filing System.

Respectfully submitted,

By: Dr. Feiyan Lv

Corporate lead, ElectroMagnetic Compatibility (EMC), Standard & Regulation

Lenovo (Beijing) Limited.

No. 6 West Shangdi Rd., HaiDian District, Beijing,

P.R.China 100085

Oct. 26, 2016

Cc: Jacky Yeung